



DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: August 31, 2005

TO: Mohamad Alhalabi, Director
St. Louis Regional Office

FROM: James L. Kavanaugh, Interim Director (*original signed by James L. Kavanaugh*)
Air Pollution Control Program

SUBJECT: Stage II Vapor Recovery "Tag Out" Enforcement Policy

This memorandum addresses a change to the current "Tag Out" policy. The department uses "Tag Outs" as an enforcement tool by allowing inspectors to remove defective vapor recovery equipment from service until repairs are made and a re-inspection performed to verify equipment is in proper working order. Once all repairs are properly made, an inspector re-opens the vapor recovery equipment for use.

Due to requests from the regulated community, the Air Pollution Control Program is implementing the following change to the "Tag Out" policy. When an inspector "Tags Out" a nozzle he or she should use a heavy-duty plastic zip tie to attach the nozzle to the nozzle pocket. This prevents a consumer from easily lifting and using a "Tagged Out" nozzle thus reducing the accidental occurrences of illegal dispensing of gasoline. If it is necessary to remove the zip tie to make repairs, the repairperson should replace the zip tie with a new one as soon as they complete repairs. This change is not intended to alter the current inspection and re-inspection procedures and practices. Inspectors will continue to perform re-inspections in the same manner as they are currently done.

Thank you for your assistance in facilitating this change.

JLK:ned

c: Air Pollution Control Program, Policy Manual
City of St. Louis, Division of Air Pollution Control
St. Louis County Department of Health, Air Pollution Control Section

